Hearing Date: August 30, 2011 at 10:00 a.m. (Prevailing Eastern Time)

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## UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11

LEHMAN BROTHERS HOLDINGS, INC., et al., : Case No. 08-13555 (JMP)

:

Debtors. : (Jointly Administered)

Debtors. .

OMX TIMBER FINANCE INVESTMENTS II, LLC'S JOINDER IN OBJECTION OF WELLS FARGO BANK NORTHWEST, N.A., AS INDENTURE TRUSTEE, TO DEBTORS' AMENDED MOTION FOR (I) APPROVAL OF THE DISCLOSURE STATEMENT AND THE FORM AND MANNER OF NOTICE OF THE DISCLOSURE STATEMENT HEARING, (II) ESTABLISHING SOLICITATION AND VOTING PROCEDURES, (III) SCHEDULING A CONFIRMATION HEARING, AND (IV) ESTABLISHING NOTICE AND OBJECTION PROCEDURES FOR CONFIRMATION OF THE DEBTORS' JOINT CHAPTER 11 PLAN

OMX Timber Finance Investments II, L.L.C. ("OMX Timber II"), by and through its undersigned counsel, hereby joins in the Objection of Wells Fargo Bank Northwest, N.A., as Indenture Trustee (in such capacity, the "Trustee"), to Debtors' Amended Motion for (I) Approval of the Disclosure Statement and the Form and Manner of Notice of the Disclosure Statement Hearing, (II) Establishing Solicitation and Voting Procedures, (III) Scheduling a Confirmation Hearing, and (IV) Establishing Notice and Objection Procedures for Confirmation

of the Debtors' Joint Chapter 11 Plan (the "Objection"). In light of the relatedness of OMX Timber II's claim (Proof of Claim No. 17120) to the Trustee's claim, OMX Timber II joins in the Objection for all of the reasons set forth therein.

Date: August 16, 2011 Respectfully submitted,

KLESTADT & WINTERS, LLP

By: <u>/s/ John E. Jureller, Jr.</u>
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The Debtors extended OMX Timber II's deadline to file an objection to the disclosure statement motion to August 16, 2011 at 5:00 p.m.

<sup>2 &</sup>lt;u>See</u> Objection at paragraph 13, fn. 3.